



DEPARTMENT OF THE ARMY  
UNITED STATES ARMY GARRISON MANNHEIM  
UNIT 29901  
APO AE 09086-9901

IMEU-MAN-PW

APR 11 2006

MEMORANDUM FOR SEE DISTRIBUTION

SUBJECT: Standard Operating Procedure for the Performance of Internal Environmental Management System (EMS) Audits at the United States Army Garrison (USAG) Mannheim

1. REFERENCES:

- a. Procedure for Nonconformance and Preventive and Corrective Action at the USAG Mannheim.
- b. Corrective Action Plan Spreadsheet.

2. PURPOSE: To provide a method for planning, performing, and reporting internal audits to verify whether the environmental activities of the USAG Mannheim and related results conform with the requirements of the Environmental Management System (EMS) elements audited. This procedure focuses on the EMS audit process. It outlines how evaluation of the garrison's conformance to the operational practices related to its EMS is to be conducted. Audit of the Garrison's compliance with environmental laws and regulations, while a part of the overall EMS auditing process, is not addressed here. The EMS Coordinator will use this procedure to fulfill the requirement to perform annual EMS conformance audits. Personnel conducting audits of the EMS elements will be qualified and independent of those having direct responsibilities for the specific areas being audited.

3. APPLICABILITY: This procedure applies to all USAG Mannheim personnel involved in the internal EMS audit process as identified in Section 5 of this procedure.

4. DEFINITIONS:

- a. EMS Audit: A systematic, documented and independent examination to objectively obtain and evaluate evidence to determine whether an organization's EMS conforms to the EMS audit criteria set by the organization, and to communicate the results of this process to management.
- b. Finding: A nonfulfillment of a specified requirement of the EMS standards and/or EMS procedure supported by objective evidence.

c. Internal Audit Team: Members of the USAG Mannheim internal auditor roster to conduct an internal audit. Audit team can consist of installation personnel and/or contractors.

d. Audit Team Lead: The audit team lead coordinates and actively monitors the conduct of the audit, and ensures that post-audit reports and audit summary reports are prepared and submitted to the EMS Management Representative.

## 5. RESPONSIBILITIES:

a. Environmental Management System Coordinator: Selects audit team and audit team lead. Provides and schedules EMS Internal Auditor Training. Develops audit plan and oversees preparation of audit checklists. Ensures that nonconformances are properly recorded. Provides audit summary results and applicable corrective action status information for EMS Management Reviews as needed.

b. Internal Audit Team: Attends auditor training on the ISO 14000 standards and internal audit procedures. Reviews all applicable policy and procedures to determine adequacy to meeting EMS requirements. Interviews personnel, reviews records, conducts site surveys, and observes work. Compares site operations to organization's established EMS procedures and writes up any non-conformances. Records findings and provides sufficient, reliable, and relevant data to support findings.

c. Audit Team Lead: Coordinates the audit schedule and specifies individual auditor assignments for internal audits. Meets with the audit team members prior to the audit to clarify audit assignments and requirements.

d. Environmental Management System Management Representative (EMSMR): Reviews and approves results of the audit, approves resulting corrective and preventive action.

## 6. PROCESSES:

a. Select audit team and schedule audit: Appointed Audit Team members shall be trained appropriately and shall be familiar with audit procedures described in the ISO 19011 standard. Auditors must also be able to audit objectively and impartially. To help ensure objectivity external team members may be selected by the EMSMR. The audit should be conducted at least annually. It is recommended to schedule the audit prior to the management review so that findings and non-conformances can be included in the management review process.

b. Develop audit plan: At a minimum, the audit plan shall include the following:

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- (1) a statement of the audit objectives; an identification of the specific section areas being audited,
  - (2) a discussion of any special emphasis or focus; references to appropriate plans, procedures, or requirements documents,
  - (3) the date(s) of the audit; an identification of the audit team, and identification.
- c. Conduct site visits and interviews: Each internal audit shall start with an opening meeting conducted by the audit team leader, and shall be attended by the audit team members and appropriate representatives of the audited organization. The audit team lead will present the scope of the audit and duties of the auditors.

The team will use a checklist (see Annex 1) for the audit preparation, that list all requirements from the ISO 14001 standard and U.S. Army internal requirements. The checklists will be used in order to ensure each ISO requirement is covered but not drive the audit. Auditing methods may include records review, interviews with individual garrison staff members, and/or direct observation of site activities. During each interview, the auditor takes notes using the audit protocol form provided in Annex 2. At the completion of the audit, while still on site, a closing session is held with the representatives of the audited organization to discuss the audit findings.

d. Record findings: Findings are recorded by each team member in accordance with the corresponding ISO section/requirement. The audit team completes the audit findings on the internal audit checklist (Annex 1).

Each non-conformance shall also be recorded in the corrective action spreadsheet ("Super Finding Sheet") located on the DPW sharedrive (Intrasite/EPAS).

The EMS Coordinator, through the CFT and the EMD, distributes the non-conformances to the each responsible organization or tenant unit identified during the audit. Responsible organization and tenant units then develop and implement a corrective action for the non-conformances attributed to them. The EMS Coordinator will include the EMS audit results in the EMS Management Review.

7. POC is Ms. Mary Kay Foley, Chief, Environmental Management Division, at DSN 381-8675, email: mary.foley@us.army.mil

Encl  
Annex 1  
Annex 2

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Annex 1: ISO 14001:2004 Internal Audit Checklist

		<b>USAG Mannheim Internal EMS Audit</b>	
#	Driver	Conformance	Potential for Improvement
		Non Conformance	Under Development
		Comment	
<b>Environmental Policy</b>			
1	Army Metric	Policy is available to installation personnel and public	
2	Army Metric	Policy has been signed by the Garrison Commander (GC)	
3	Army Metric	Policy is consistent with ISO 14001 and the Army Environmental Management System Action Memorandum (Ray Fatz Memo)	
4	Army Policy	Policy is fenceline to fenceline in scope	
5	ISO Sec. 4.2	Policy is appropriate to nature/scale/environmental impacts of its activities/products/services	
6	ISO Sec. 4.2	Policy includes a commitment to continual improvement	
7	ISO Sec. 4.2	Policy includes a commitment to prevention of pollution	
8	ISO Sec. 4.2	Policy includes a commitment to comply with applicable legal and other requirements	
9	ISO Sec. 4.2	Policy provides framework for setting/reviewing environmental objectives/targets	
10	ISO Sec. 4.2	Policy documented, implemented, maintained, and communicated to all persons working for or on behalf of the organization	
11	ISO Sec. 4.2	Policy is available to the public	
<b>Army Implementation Milestone -- 30 Mar 04</b>			
<b>Self Assessment</b>			
12	Army Metric	Self Assessment has been documented	
13	Army Metric	Self Assessment is installation-wide in scope	
14	Army Metric	Self-Assessment has been briefed to the Garrison Commander	
<b>Implementation Plan</b>			
15	Army Metric	EMS Implementation Plan has been documented	

<b>USAG Mannheim Internal EMS Audit</b>		
#	Driver	Comment
16	Army Metric	Implementation Plan includes scheduled dates, identified resources, and organizational responsibilities
17	Army Metric	Plan is installation-wide and mission-focused in scope of implementation
18	Army Metric	Plan provides for achieving an ISO 14001 conformant EMS NLT FY 09
19	Army Metric	Plan has been signed by the Garrison Commander
<b>Army Implementation Milestone -- 30 Sep 04</b>		
<b>Prioritized List of Environmental Aspects</b>		
20	Army Metric	Prioritized list of environmental aspects consistent with ISO 14001 and Army policy
21	Army Metric	The list of significant aspects has been briefed to Garrison Commander
22	Army Metric	A list of aspects has been developed for installation-wide activities, products or services
23	ISO Sec. 4.3.1	Procedures exist to identify environmental aspects of the installation activities, products or services; define criteria for determining those aspects over which it has control, should be expected to control, or influences; and define criteria for determining those aspects which can significantly impact the environment
24	ISO Sec. 4.3.1	Environmental aspects/impacts information is kept up-to-date
25	ISO Sec. 4.3.1	The significant environmental aspects are taken into account in establishing, implementing and maintaining its environmental management system
<b>Army Implementation Milestone -- 30 Sep 04</b>		
<b>Legal and Other Requirements</b>		
26	ISO Sec. 4.3.2	The organization has established a procedure to identify and have access to legal and other requirements that are applicable to the environmental aspects of its activities, products, or

#	Driver	services	USAG Mannheim Internal EMS Audit		
			Conformance	Potential for Improvement	Non Conformance
<b>Objectives and Targets</b>					
27	ISO Sec. 4.3.3	The organization has established and maintained documented environmental objectives and targets, at each relevant function and level within the organization			
28	ISO Sec. 4.3.3	In establishing the objectives and targets, the organization considered:  -its legal and other requirements -its significant environmental aspects -its technological options -its financial, operational, and business requirements -the views of interested parties			
29	ISO Sec. 4.3.3	The objectives and targets are consistent with the organization's environmental policy			
30	ISO Sec. 4.3.3	The objectives and targets include the commitment to pollution prevention			
<b>Environmental Management Programs</b>					
31	ISO Sec. 4.3.4	The organization has established and maintains a program for achieving its objectives and targets			
32	ISO Sec. 4.3.4	Responsibility has been designated for achieving these objectives and targets at each relevant function and level of the organization			
33	ISO Sec. 4.3.4	The Environmental Management Program (EMP) includes designated means and dates by which they are to be achieved			
34	ISO Sec. 4.3.4	The EMP is amended when necessary as the organization's activities are modified / transformed			
<b>Structure and Responsibility</b>					
35	ISO Sec 4.4.1	Roles, responsibilities, and authorities have been defined, documented, and communicated to facilitate effective environmental management			

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#	Driver	Conformance	Conformance				
36	ISO Sec 4.4.1	Resources essential to the implementation and control of EMS have been provided					
37	ISO Sec 4.4.1	The organization's top management has appointed a specific EMS Management Representative who (irrespective of other responsibilities) shall ensure that EMS requirements are established, implemented, and maintained IAW ISO 14001					
<b>Awareness Training</b>							
38	Army Metric	An awareness training procedure has been documented					
39	Army Metric	The documented awareness training procedure has been followed and appropriate personnel receive training					
40	Army Metric	The awareness procedure has been followed and appropriate personnel have received EMS Awareness Training					
41	Army Policy	The scope of awareness training is installation-wide					
<b>Army Implementation Milestone -- 30 Sep 04</b>							
<b>Competency Training</b>							
42	ISO Sec. 4.4.2	The documented training procedure identifies personnel performing tasks that cause significant environmental impacts, and identifies appropriate competency training for those personnel					
43	ISO Sec. 4.4.2	The procedure has been followed and appropriate personnel have received competency training					
<b>Communication</b>							
44	ISO Sec. 4.4.3	The organization has established and maintains written procedures for internal communication between the various levels and functions of the organization receiving, documenting, and responding to relevant communication from external interesting parties					
45	ISO Sec. 4.4.3	The organization has considered processes for external communication on its significant aspects and has recorded its					

#	Driver	decision	Comment
<b>USAG Mannheim Internal EMS Audit</b>			
46	Audit No.: ISO Sec. 4.4.4	The organization has established and maintains information (in paper or electronic form) to describe the core elements of the EMS and their interaction, and to provide direction to related documentation	Under Development
47	Audit Team: ISO Sec. 4.4.5	<p>The organization has established and maintains procedures for controlling all documents required by ISO 14001 to ensure</p> <ul style="list-style-type: none"> <li>- they can be located</li> <li>- they are periodically reviewed, revised as necessary, and approved for adequacy by authorized personnel</li> <li>- the current versions of relevant documents are available at all locations where operations essential to the effective functioning of the EMS are performed</li> <li>- obsolete documents are promptly removed from all points of issue and points of use, or otherwise assured against unintended use</li> <li>- any obsolete documents retained for legal and/or knowledge preservation purposes are suitably identified</li> </ul>	Non Conformance
48	Audit Dates: ISO Sec. 4.4.5	EMS documentation is legible, dated or marked with revision #, and readily identifiable, maintained in an orderly manner, and maintained for a specified period	Potential for Improvement
49	Audited Divisions: Reference: ISO Sec. 4.4.5	Procedures and responsibilities are established for the creation and modification of various types of documents	Conformance
<b>Operational Control</b>			
50	Reference: ISO Sec. 4.4.6	The organization has identified those operations and activities associated with its significant environmental aspects in line with its policy, objectives and targets	Under Development
51	ISO Sec. 4.4.6	The organization has planned these activities (including maintenance) to ensure that they are carried out under specified	Non Conformance

USAG Mannheim Internal EMS Audit

#	Driver	Condition	Comment
		conditions by:	
		- establishing and maintaining documented procedures to cover situations where the absence of documented procedures would lead to deviations for the environmental policy and objectives and targets	
		- stipulating operating criteria in the procedures	
		- establishing and maintaining procedures related to the identifiable significant aspects of goods/services used by the organizations and communicating relevant procedures and requirements to suppliers / contractors	
<b>Emergency Preparedness &amp; Response</b>			
52	ISO Sec. 4.4.7	The organization has established and maintains procedures to identify the potential for and to respond to accidents and emergency situations, and for preventing and mitigating the environmental impacts that may be associated with them	
53	ISO Sec. 4.4.7	These emergency preparedness and response procedures are reviewed and revised when necessary, as well as after the occurrence of accidents or emergency situations	
54	ISO Sec. 4.4.7	The organization periodically tests these procedures where practicable	
<b>Monitoring and Measurement</b>			
55	ISO Sec. 4.5.1	The organization has established and maintains documented procedures to regularly monitor and measure the key characteristics of its operations and activities that can have a significant impact on the environment	
56	ISO Sec. 4.5.1	These procedures include the recording of information to track performance, relevant operational controls, and conformance with the organization's environmental objectives and targets	
57	ISO Sec. 4.5.1	Monitoring equipment is calibrated and maintained, and calibration records are retained according to the organization's	

#	Driver	<b>USAG Mannheim Internal EMS Audit</b>		Comment
		Conformance	Potential for Improvement	
58	ISO Sec. 4.5.1	procedures	Non Conformance	Under Development
<p><b>Nonconformance &amp; Corrective &amp; Preventive Action</b></p> <p>59 ISO Sec. 4.5.2      The organization has established and maintains procedures for:</p> <ul style="list-style-type: none"> <li>- defining responsibility and authority for handling and investigating non-conformances, taking actions</li> <li>- taking action to mitigate any impacts caused</li> <li>- initiating and completing corrective and preventive action</li> </ul> <p>60 ISO Sec. 4.5.2      Any corrective / preventive action taken to eliminate the causes of actual / potential non-conformances is appropriate to the magnitude of problems and commensurate with the environmental impact encountered</p> <p>61 ISO Sec. 4.5.2      The organization has implemented and recorded any changes in the documented procedures resulting from corrective and preventive action</p>				
<p><b>Records</b></p> <p>62 ISO Sec. 4.5.3      The organization has established and maintains procedures for identification, maintenance, and disposition of environmental records (including training records, audit results, and management review results).</p> <p>63 ISO Sec. 4.5.3      These records are legible, identifiable, and traceable to the activity / product / service involved</p> <p>64 ISO Sec. 4.5.3      Environmental records are stored and maintained in such a way that they are readily retrievable and protected against damage, deterioration, or loss</p> <p>65 ISO Sec. 4.5.3      Retention times have been established and recorded for the various types of records</p> <p>66 ISO Sec. 4.5.3      Records are maintained, as appropriate to the system and</p>				

#	Driver	organization, to demonstrate conformance to the requirements of ISO 14001	Conformance	Potential for Improvement	Non Conformance	Under Development	Comment
<b>Internal EMS Audit</b>							
67	ISO Sec. 4.5.4	The organization has established and maintains programs and procedures for periodic internal EMS audits to:					
68	ISO Sec. 4.5.4	- determine whether the EMS conforms to the organization's own EMS procedures / documentation, as well as ISO 14001					
69	ISO Sec. 4.5.4	- determine whether the EMS has been properly implemented and maintained					
70	ISO Sec. 4.5.4	- provide information on the results of audits to management					
71	ISO Sec. 4.5.4	The audit program and schedule is based on the importance of the activity concerned and the results of previous audits					
72	ISO Sec. 4.5.4	The audit procedures cover the audit scope, frequency, and methodologies, as well as the responsibilities and requirements for conducting audits and reporting results					
<b>EMS Management Review</b>							
73	Army Metric	A written procedure has been developed for conducting recurring internal EMS management reviews					
74	Army Metric	The Garrison Commander and the Environmental Quality Control Committee have conducted at least one documented Management Review					
75	Army Metric	The EMS Management Review included a review of progress on the Installation's Implementation Plan					
<b>Army Implementation Milestone - 31 Dec 05</b>							
<b>EMS Framework in Place</b>							
76	Army Policy	The Installation has an EMS framework in place as defined by the Army Army / DoD metrics					

